

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE



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Jonathan Leite,  
Plaintiff

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v.

Civil No. 15-cv-00280-PB

Matthew Goulet *et al.*,  
Defendants

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**AFFIDAVIT OF TREVOR DUBE**

I, Trevor Dube, upon oath do hereby depose and state as follows:

1. I am employed by the Department of Corrections as a Corrections Officer at NCF and have been so employed for over eleven years.
2. My review of DOC logs reveals I was working second shift on August 24, 2012 as the officer-in-charge (OIC) of the Upper Housing Unit.
3. A review of the rounds sheet for that same day indicates that I conducted rounds at approximately 3:45 p.m. and approximately 4: 50 p.m, as well as other times that day/evening. I have no independent recollection of the rounds from that particular day. I now know, having been shown video from that day that I conducted rounds on the upper tier of F Block at approximately 3:41 p.m.
4. If there was anything unusual that occurred during a round, it would have been noted and dealt with immediately. I did not note any occurrence that was unusual.
5. Prisons are dangerous places, and we cannot predict that an assault will occur. Rounds and Counts enable us as officers to keep safety and security, but inmates attempt to cover-up their actions.
6. If there is a known risk to an inmate from another inmate, those inmates will be kept separate. They will not be housed together. Inmate Leite did not have any keep separates.
7. If an inmate believes he is at risk of an assault or some danger befalling him, the inmate may also request protective custody. An inmate would be removed from the area and then an internal administrative process would be initiated to

determine the best course of action for that particular inmate. Inmate Leite did not inform me of any need for protective custody. Likewise, he did not inform me of any particular risk to another inmate.

8. I do know that neither any inmate nor any staff member indicated to me on August 24, 2012 that there was a particularized threat of harm or particularized risk of violence on F Block, or even a general risk greater than any other day relative to Inmate Leite or anyone else.
9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date:      October 10, 2017

/s/ Trevor Dube  
Trevor Dube